

Attorney or Party Name, Address, Telephone & FAX Numbers, State Bar Number & Email Address Janine Jasso PO Box 370161 El Paso, TX 79937 Email: j9_jasso@yahoo.com <input checked="" type="checkbox"/> Plaintiff(s) appearing without attorney <input type="checkbox"/> Attorney for Plaintiff(s)	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION	
In re: JAMIE LYNN GALLIAN <div style="text-align: right;">Debtor(s).</div>	CASE NUMBER: 8:21-bk-11710-SC ADVERSARY NUMBER: 8:21-ap-01096-SC CHAPTER: 7
Janine Jasso <div style="text-align: right;">Plaintiff(s),</div> <div style="text-align: center;">vs.</div> Jamie Lynn Gallian, an individual; J-PAD, LLC, a California Limited Liability Company; J-SANDCASTLE CO LLC, a California Limited Liability Company; and DOES 1 through 100, inclusive, <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> AMENDED NOTICE OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT UNDER LBR 7055-1 </div> DATE: 02/08/2023 TIME: 11:00 am COURTROOM: 5C - Virtual ADDRESS: 411 W. Fourth St. <div style="text-align: right;">Santa Ana, CA 92701</div>

TO THE DEFENDANT, DEFENDANT'S ATTORNEY AND OTHER INTERESTED PARTIES:

1. Name of Defendant(s) against whom default judgment is sought (*specify name*): J-Pad, LLC and J-Sandcastle Co LLC
2. Plaintiff filed the complaint in the above-captioned proceeding on (*specify date*): 11/16/2021
3. The Summons and Complaint were served on Defendant by ☒ personal service ☐ mail service on the following date (*specify date*): 11/22/2022
4. A true and correct copy of the completed return of summons form is attached.

"Bankruptcy Code" and "11 U.S.C." refer to the United States Bankruptcy Code, Title 11 of the United States Code. "FRBP" refers to the Federal Rules of Bankruptcy Procedure. "LBR" and "LBRs" refer to the Local Bankruptcy Rule(s) of this court.

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

5. The time for filing an answer or other response expired on (*specify date*): 12/20/2021
6. No answer or other response has been filed or served by Defendant.
7. The default of Defendant:
- a. ☐ Has not yet been entered, but is requested
- b. ☒ Was entered on (*specify date*): 11/02/2022
8. **A Status Conference:**
- a. ☒ Is scheduled for (*specify date, time, and place*): February 14, 2023; 1:30pm, U.S. Bankruptcy Court, Santa Ana, Rm 5C - Virtual
- b. ☐ Was held on (*specify date, time, and place*): _____
9. As proof that Plaintiff is entitled to the relief requested in the complaint, Plaintiff:
- a. ☒ Relies on the complaint and attached documents.
- b. ☒ Attaches the following documents to establish a *prima facie* case:
- (1) ☒ Declaration of (*specify*): Janine Jasso ISO of Mtn & Exhibits; Filed concurrently [DK 90]
- (2) ☐ Declaration of (*specify*): _____
- (3) ☒ Other (*specify*): Plaintiff's Brief ISO of Ntc of Motion and Motion [DK 89, pages 4-98]
10. As further support for entry of a default judgment, Plaintiff submits a memorandum of points and authorities (optional).
11. **DECLARATION OF NON-MILITARY STATUS** (Servicemembers Civil Relief Act, 50 U.S.C. chapter 50 (§§ 3901-4043)). The undersigned party or counsel declares under penalty of perjury, with respect to each Defendant against whom a default judgment is sought by this motion:
- a. ☒ Defendant is not currently in military service. The facts that support this statement are as follows (*see the court's website for information about how to verify non-military status*):
The Defendants are corporations, specifically California limited liability companies
- b. ☐ Defendant is currently in military service. The facts that support this statement are as follows (*if this box is checked, the plaintiff must attach a supplement to this motion addressing the requirements in 50 U.S.C. § 3931(b)(2) to appoint an attorney for the Defendant before entering a judgment*):
- c. ☐ I am unable to determine whether or not Defendant is in military service. The facts that support this statement are as follows (*if this box is checked, the plaintiff must attach a supplement to this motion addressing the bond requirement in 50 U.S.C. § 3931(b)(3)*):

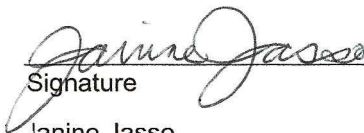
12. Defaulting party is not an infant or incompetent party.

Plaintiff requests that this court enter a default judgment in favor of Plaintiff. A copy of the lodged proposed default judgment is attached.

Date: 01/04/2023

Respectfully submitted,

Printed name of law firm



Signature

Janine Jasso

Name of Attorney for Plaintiff or Plaintiff

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
7101 N. Mesa, Ste 355
El Paso, TX 79912

A true and correct copy of the foregoing document entitled (*specify*): **Amended Notice of Motion for Entry of Default Judgments Against Defendants J-Pad, LLC and J-Sandcastle Co LLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 1/4/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See NEF for confirmation of electronic transmission to the U.S. trustee, any trustee in this case, and to any attorneys who received service by NEF.

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 1/4/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR AND DEFENDANT	DEFENDANT J-PAD, LLC	DEFENDANT J-SANDCASTLE CO LLC
JAMIE LYNN GALLIAN	ROBERT L MCLELLAND, CEO	RONALD J PIERPONT, CEO 16222
MONTEREY LANE, SPC 376	16222 MONTEREY LANE, SPC 376	16222 MONTEREY LANE, SPC 376
HUNTINGTON BEACH, CA 92649	HUNTINGTON BEACH, CA 92649	HUNTINGTON BEACH, CA 92649

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 1/4/2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott Clarkson, USBC, 411 West Fourth Street, Santa Ana, CA 92701 (Suspended Due to Covid-19 Protocols)

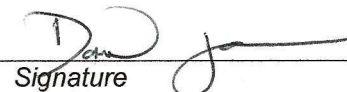
Courtesy Copy via email: Aaron De Leest, Esq., adeleest@danninggill.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1-4-2023
Date

David Jasso
Printed Name


Signature